

1 Steve Dimopoulos, Esq.  
2 Nevada Bar No. 12729  
3 Paul A. Shpirt, Esq.  
4 Nevada Bar No. 1044  
5 Jared Kahn, Esq.  
6 Nevada Bar No. 12603  
7 DIMOPOULOS INJURY LAW  
8 6671 South Las Vegas Boulevard, Suite 275  
9 Las Vegas, Nevada 89119  
10 O: (702) 800-6000  
11 F: (702) 224-2114  
12 sd@stevedimopoulos.com  
13 ps@stevedimopoulos.com  
14 jkahn@jk-legalconsulting.com

1 Steve W. Berman  
2 (admitted *pro hac vice*)  
3 HAGENS BERMAN SOBOL SHAPIRO LLP  
4 1301 Second Avenue, Suite 2000  
5 Seattle, WA 98101  
6 T: (206) 268-9340  
7 F: (206) 623-0594  
8 steve@hbsslaw.com

1 Christopher R. Pitoun  
2 (admitted *pro hac vice*)  
3 HAGENS BERMAN SOBOL SHAPIRO LLP  
4 301 North Lake Avenue, Suite 920  
5 Pasadena, CA 91101  
6 T: (213) 330-7150  
7 F: (213) 330-7152  
8 christopherp@hbsslaw.com

11 *Attorneys for Plaintiffs*  
12 [Additional Counsel Listed on Signature Page]

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 JACK DIEP, individually; JORY LEVY,  
16 individually; JAMES DAYAP, individually;  
17 MARVIN CUTCHINS; and RAY  
CHARLES, JR.,

18 Plaintiffs,

19 v.

20 LIBERTY MEDIA CORPORATION d/b/a  
21 FORMULA ONE HEINEKEN SILVER LAS  
22 VEGAS GRAND PRIX, a foreign  
23 corporation; LAS VEGAS PAVING  
24 CORPORATION, a Nevada corporation;  
DOE INDIVIDUALS 1-20, inclusive; and  
ROE CORPORATIONS 1-20, inclusive,

25 Defendants.

Case No. 2:23-cv-02124-GMN-NJK

**STIPULATION AND ORDER TO  
MODIFY BRIEFING SCHEDULE  
FOR DEFENDANTS' MOTIONS TO  
DISMISS PLAINTIFFS'  
CONSOLIDATED CLASS ACTION  
COMPLAINT**

**(First Request)**

1 Pursuant to Local Rule IA 6-1, 6-2 and LR 7-1, the undersigned counsel of record for  
 2 Plaintiffs, Defendant Liberty Media Corporation (“Liberty”), and Defendant Las Vegas Paving  
 3 Corporation (“Las Vegas Paving”) (collectively the “Defendants”) hereby STIPULATE to  
 4 extend the time for Plaintiffs to file their Opposition to Defendants’ respective motions to  
 5 dismiss Plaintiffs’ Consolidated Class Action Complaint and for Defendants to file their  
 6 Replies by fourteen days as explained below. Per LR 7-2(b), Plaintiffs’ Oppositions to  
 7 Defendants’ Motions are currently due June 21, 2024, and Defendants’ Reply briefs are due  
 8 June 28, 2024.

9 On May 24, 2024, Plaintiffs filed their Consolidated Class Action Complaint. ECF No.  
 10 37. On June 7, 2024, Defendants timely filed their respective motions to dismiss. ECF Nos.  
 11 38, 39. The parties STIPULATE that the new deadline for Plaintiffs to file their Opposition  
 12 shall be **July 5, 2024**. The parties further STIPULATE that the new deadline for Defendants  
 13 to file their respective Replies shall be **July 26, 2024**.

14 The reason for the requested extension is that Plaintiffs’ counsel is travelling cross-  
 15 country for an in-person hearing for another matter in the Eastern District of New York on  
 16 June 18, 2024. This hearing is in the middle of the two-week period Plaintiffs have to oppose  
 17 Defendants’ motions under the local rules. *See* LR 7-2(b). Moreover, Plaintiffs’ counsel submit  
 18 that Defendants’ motions raise several issues that require in-depth analysis and Plaintiffs  
 19 require additional time to properly oppose. Similarly, the parties agree that twenty-one days  
 20 (rather than seven days allowed under the LR 7-2(b)) allows sufficient time for Defendants to  
 21 properly reply to Plaintiffs’ intended opposition.

22 This is the first stipulation to extend the subject deadlines. The parties submit that the  
 23 request is made in good faith and not for purposes of delay.

1 DATED: June 14, 2024

2 **HAGENS BERMAN SOBOL SHAPIRO  
3 LLP**

4 By /s/ Steve W. Berman

5 Steve W. Berman (admitted *pro hac vice*)  
6 1301 Second Avenue, Suite 2000  
7 Seattle, WA 98101  
8 T: (206) 268-9340  
9 F: (206) 623-0594  
10 steve@hbsslaw.com

11 Christopher R. Pitoun (admitted *pro hac vice*)  
12 HAGENS BERMAN SOBOL SHAPIRO LLP  
13 301 North Lake Avenue, Suite 920  
14 Pasadena, California 91101  
15 T: (213) 330-7150  
16 F: (213) 330-7152  
17 christopherp@hbsslaw.com

18 Jared Kahn, Esq.  
19 Nevada Bar No. 12603  
20 Steve Dimopoulos, Esq.  
21 Nevada Bar No. 12729  
22 Paul A. Shpirt, Esq.  
23 Nevada Bar No. 1044  
24 DIMOPOULOS INJURY LAW  
25 6671 South Las Vegas Boulevard, Suite 275  
26 Las Vegas, Nevada 89119  
27 O: (702) 800-6000  
28 F: (702) 224-2114  
sd@stevedimopoulos.com  
ps@stevedimopoulos.com  
jkahn@jk-legalconsulting.com

Respectfully submitted,

**O'MELVENY & MYERS LLP**

By /s/ Esteban Rodriguez

Esteban Rodriguez (admitted *pro hac  
vice*)

David Marroso (admitted *pro hac vice*)  
1999 Avenue of the Stars, Seventh Floor  
Los Angeles, CA 90067  
T: (310) 553-6700  
F: (310) 246-6779  
esrodriguez@omm.com  
dmarroso@omm.com

J. Colby Williams (5549)  
Philip R. Erwin (11563)  
**CAMPBELL & WILLIAMS**  
710 South Seventh Street  
Las Vegas, Nevada 89101  
T: (702) 382-5222  
F: (702) 382-0540  
jcw@cwlawlv.com  
pre@cwlawlv.com

*Attorneys for Defendant  
Liberty Media Corporation*

**MARQUIS AURBACH**

By /s/ Jennifer L. Micheli

Jennifer L. Micheli (11210)

Tye S. Hanseen, Esq. (10365)  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
T: (702) 382-0711  
F: (702) 382-5816  
jmicheli@maclaw.com  
thanseen@maclaw.com

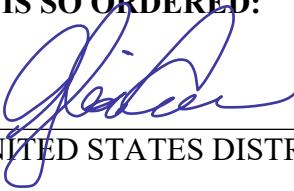
*Attorneys for Las Vegas Paving  
Corporation*

1 Cheryl H. Wilson, Esq.  
2 Nevada Bar No. 8312  
3 Victoria L. Hightower, Esq.,  
4 Nevada Bar No. 10897  
5 IVIE McNEILL WYATT PURCELL &  
6 DIGGS  
7 7455 Arroyo Crossing, Suite 220  
8 Las Vegas, NV 89113  
9 (725) 677-4055 (Telephone)  
10 (725) 239-4055 (Facsimile)  
11 Email: [cwilson@imwlaw.com](mailto:cwilson@imwlaw.com)  
12 Email: [vheightower@imwlaw.com](mailto:vheightower@imwlaw.com)

13 Rodney S. Diggs, Esq. (admitted *pro hac vice*)  
14 California Bar No. 274459  
15 IVIE McNEILL WYATT PURCELL &  
16 DIGGS  
17 444 S. Flower Street, 18th Floor  
18 Los Angeles, CA 90071  
19 (213) 489-0028 (Telephone)  
20 Email: [rdiggs@imwlaw.com](mailto:rdiggs@imwlaw.com)

21 *Attorneys for Plaintiffs*

22 **IT IS SO ORDERED:**

23   
24 

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UNITED STATES DISTRICT JUDGE

25 Dated: June 17, 2024  
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## **CERTIFICATE OF SERVICE**

I hereby certify that on June 14, 2024, I caused the foregoing document to be served upon counsel of record via electronic mail.

DATED: June 14, 2024

/s/ Steve W. Berman

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Steve W. Berman